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### IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF OREGON

## PORTLAND DIVISION

In Re GALENA BIOPHARMA, INC.

SECURITIES LITIGATION,

Case No.: 3:14-cv-367-SI

(CONSOLIDATED, LEAD)

3:14-cv-389-SI

This Document Relates To:

3:14-cv-410-SI

ALL ACTIONS.

3:14-cv-435-SI

3:14-cv-558-SI

DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME

### LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, counsel for defendant Ahn has conferred with counsel for plaintiffs, who do not oppose this motion.

#### **MOTION**

Defendants respectfully move for an order extending the deadline to respond to the complaint to December 31, 2015. This motion is unopposed.

### **MEMORANDUM**

On November 2, 2015, this Court entered an order granting the parties' stipulated briefing schedule, which required Galena Defendants, Outside Director Defendants and Defendant Mark J. Ahn ("the Defendants") file their answer to the complaint by November 30, 2015. (ECF No. 157.) The Defendants respectfully request that the Court extend the deadline to respond to the complaint to December 31, 2015.

The parties to this lawsuit participated in a mediation on September 19, 2015, and are continuing to actively engage in settlement negotiations and are close to resolving this dispute. The Defendants request that this court extend the deadline to respond to December 31, 2015, to allow the parties to finalize the ongoing settlement negotiations. Good cause for the extension exists in order to conserve the parties' and the Court's resources during these settlement negotiations. No undue delay will ensue as a result of the extension and the extension will not impact any current discovery deadlines.

DATED: November 30, 2015.

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